

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SADE COKER,

Plaintiff,

—against—

GOLDBERG & ASSOCIATES P.C., and
JULIE GOLDBERG, ESQ., an individual,

Defendants.

Case No. 21-cv-1803-JLR

**DECLARATION IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES & COSTS**

DEEBAN SIVA, ESQ., an attorney in this matter, declares under penalty of perjury that the following facts are true and correct.

1. I am the attorney for Defendants GOLDBERG & ASSOCIATES P.C. ("Company Defendant") and JULIE GOLDBERG, ESQ ("Individual Defendant", and collectively with Company Defendant, "Defendants"), and as such, I am familiar with the material facts relative to this motion.

2. I submit this declaration in opposition to Plaintiff SADE COKER ("Coker" or "Plaintiff")'s motion for an order granting attorneys' fees and costs of \$53,667.00 plus litigation costs in the amount of \$1,593.97, for a total of \$55,260.07.

3. Plaintiff instituted the subject case to retrieve unpaid wages from Defendants.

4. Plaintiff was successful in obtaining judgment for \$4,986.14 against Defendants.

5. Plaintiff now requests a whopping \$55,260.07 in attorneys' fees and costs.

6. Not only is there a large disproportionality between the judgment amount awarded and the attorney's fees and costs claimed, but there are also a number of issues with the time entries recorded and claimed by Plaintiff's counsel.

7. These issues are reflected in the activity log of Plaintiff's counsel which Defendants' counsel has transposed into an excel spreadsheet. See "**Exhibit A**" annexed hereto.

WHEREFORE, Defendants respectfully request that the court deny Plaintiff's Motion for Attorneys' Fees and Costs. Alternately, Defendants respectfully request the Court lower the amount requested to no more than \$30,546, at the discretion of the Court.

Dated: April 3, 2024
New York, New York



Deeban Siva, Esq.
Jones Law Firm, P.C.
1270 6th Avenue, 7th Floor
New York, NY 10020
(212) 258-0685
deeban@joneslawnyc.com
Attorneys for Defendants